

Robert B. Pincus  
Special Master  
108 Rockford Grove Lane  
Wilmington, DE 19806

May 9, 2021

**BY CM/ECF**

The Honorable Leonard P. Stark  
Chief Judge  
U.S. District Court for the District of Delaware  
U.S. Courthouse  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,  
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Chief Judge Stark:

Pursuant to Your Honor's Memorandum Order (D.I. 258), submitted herewith is a Proposed Order Regarding Special Master.

Despite the good faith efforts of the parties and ConocoPhillips, which spent a good portion of the last several days working together to reach an agreed upon proposed order, there are two matters in the attached proposed order, which have not been agreed to. First, are the various references to OFAC considerations in the proposed order and second is ConocoPhillips' opposition to the magnitude of the aggregate fees and expenses of the Special Master that may be incurred in connection with submitting the Proposed Sales Procedures Order to the Court. Other than those two matters, to the best of my knowledge, all other provisions of the proposed order have been agreed to by the parties and ConocoPhillips.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully submitted,

*/s/ Robert B. Pincus*

Robert B. Pincus

RBP  
Enclosure  
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